

MAYER | BROWN

Mayer Brown LLP
1221 Avenue of the Americas
New York, NY 10020-1001
United States of America

T: +1 212 506 2500
F: +1 212 262 1910

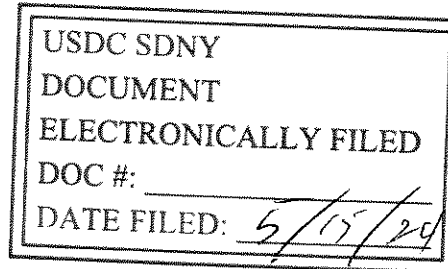
mayerbrown.com

MEMO ENDORSED

May 14, 2024

BY E-MAIL

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007



Gina M. Parlovecchio

Partner

T: +1 212 506 2522

F: +1 212 849 5522

GParlovecchio@mayerbrown.com

Jason Linder

Partner

T: +1 213 229 5132

F: +1 213 576 8188

JLinder@mayerbrown.com

Re: United States v. Ryan Salame, No. 1:22-cr-673-
LAK (S.D.N.Y.)

Dear Judge Kaplan:

On behalf of Ryan Salame, and pursuant to the Court's Individual Rules of Practice for Sentencing Proceedings, we respectfully submit this request for an order permitting the redaction of personally identifying information contained within Mr. Salame's sentencing submission—namely, email addresses, home addresses, and phone numbers of certain individuals who have submitted letters of support on behalf of Mr. Salame and certain references to private medical information.

As set forth in the Court's Individual Rules of Practice, Mr. Salame's redaction request is narrowly tailored to serve the privacy interests of the third parties who authored these letters of support and safeguard sensitive medical information involving a minor. *See United States v. Amodeo*, 71 F.3d 1044, 1048, 1050–51 (2d Cir. 1995) (finding privacy interests of third parties compelling reason to justify sealing). Such information adds little to the public record, while disclosure of this information would create significant privacy concerns for innocent third parties given the media attention this case has drawn. *See Gardner v. Newsday, Inc.*, 895 F.2d 74, 79–80 (2d Cir. 1990). The sealing is narrowly tailored to ensure the substance of each letter and the identity of the individual who authored each letter will remain fully accessible to the public.

For the foregoing reasons, we respectfully request that the Court grant Mr. Salame's redaction request.

Respectfully submitted,

/s/ Gina M. Parlovecchio

Gina M. Parlovecchio

Jason Linder

SO ORDERED

LEWIS A. KAPLAN, USDJ